

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NIRVETA KUSURAN,

Plaintiff,

V.

Case No. 08-C-794

Judge Moran

**SIX CONTINENTS HOTELS, INC., d/b/a
INTERCONTINENTAL HOTELS GROUP,**

Magistrate Judge Nolan

Defendants.

**AGREED MOTION FOR AN EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD**

Defendant, Six Continents Hotels, Inc. by their attorneys, Morgan, Lewis & Bockius, moves for an extension of time to answer or otherwise plead. In support of the Motion, Defendant state as follows:

1. On February 6, 2008, Plaintiff Nirveta Kusuran (“Plaintiff”), filed a Complaint against Defendants in Northern District of Illinois, Eastern Division, Case No. 08 C 794 (the “Complaint”).

2. Defendant retained Morgan, Lewis & Bockius, LLP on May 14, 2008, as counsel in this matter.

3. At the previous status hearing, counsel had indicated that it would be able to get the Answer and Appearances on file by the next status hearing, May 21, 2008.

3. Because they have recently been retained, counsel requires additional time to investigate the allegations contained in plaintiff's Complaint.

4. Accordingly, defendant requests an additional 7 days, or until May 28, 2008, to answer or otherwise plead in response to plaintiff's Complaint.

5. Plaintiff's counsel has been contacted and has no objection to the 7-day extension.

6. This is the first extension requested by defendants.

7. A 7 day extension of time will not cause excessive delay in the litigation and will not unduly prejudice any party.

WHEREFORE, Defendant respectfully requests the Court grant an additional 7 days, or until May 28, 2008 to Answer or otherwise plead to Plaintiff's First Amended Complaint.

Dated: May 19, 2008

Respectfully submitted,

SIX CONTINENTS HOTELS, INC., d/b/a
INTERCONTINENTAL HOTELS GROUP,

By: s/ Lucy Schwallie
One of Their Attorneys

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